

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

BABY DOE, et al.,

Plaintiffs,

V.

JOSHUA MAST, et al.,

Defendants,

and

UNITED STATES SECRETARY OF
STATE ANTONY BLINKEN, et al.,

Nominal Defendants.

Case No. 3:22-cv-00049-NKM

**CONSENT MOTION FOR EXTENSION OF
TIME TO FILE RESPONSIVE PLEADING**

Defendant Kimberley Motley moves under Civil Rule 6(b)(1), and for good cause shown, for an extension of time to file her response to Plaintiffs' Complaint until October 17, 2022. In support of her motion, Ms. Motley states the following:

1. Plaintiffs filed their Complaint on September 2, 2022.
2. Plaintiffs served the Complaint on Ms. Motley on September 7, 2022.
3. Ms. Motley's initial responsive pleading is currently due on September 28, 2022.
4. Counsel is requesting an extension of time within which to file a responsive pleading through October 17, 2022.

5. Ms. Motley just recently retained the undersigned counsel, and additional time is required for counsel to sufficiently evaluate and respond to the Complaint's allegations in light of counsel's other professional obligations.

6. Plaintiffs have consented to Ms. Motley's request for an extension of time to October 17, 2022.

For the foregoing reasons, Defendant Kimberly Motley respectfully requests the Court to enter an order extending her deadline to answer or otherwise respond to Plaintiffs' Complaint to October 17, 2022.

Dated: September 27, 2022.

/s/ Thomas W. Davison

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Counsel for Defendant Kimberley Motley

CERTIFICATE OF SERVICE

I certify that on September 27, 2022, I filed this Consent Motion for Extension of Time to File Responsive Pleading using the Court's CM/ECF system, which will provide service to all counsel of record.

/s/ Thomas W. Davison

Thomas W. Davison